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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

WYATT B., *et al.*,

Plaintiffs,

v.

TINA KOTEK, *et al.*,

Defendants.

Case No. 6:19-cv-00556-AA

**PLAINTIFFS' RESPONSES TO
DEFENDANTS' OBJECTIONS TO
PLAINTIFFS' TRIAL EXHIBITS**

GENERAL RESPONSES

In objecting to approximately 390 of Plaintiffs' 437 exhibits,¹ Defendants repeat many of the same, flawed objections. Plaintiffs provide the following General Responses, which are incorporated below, and address many of Defendants' objections:

1. Defendants object to several of Plaintiffs' exhibits as "Inadmissible for the reasons explained in Defendants' Motions in Limine." Defendants' Motions in Limine should be denied for the reasons explained in Plaintiffs' Opposition to Defendants' Motions in Limine, ECF 435, and therefore Defendants' objections on this basis should also be rejected.

2. Defendants object to several of Plaintiffs' exhibits as "Inadmissible for the reasons explained in Defendants' *Daubert* motion." Defendants' *Daubert* Motion should be denied for the reasons explained in Plaintiffs' Responses to Defendants' *Daubert* Motion, *see* ECF Nos. 360 and 362, and therefore, Defendants' objections on this basis should also be rejected.

3. Defendants object to Plaintiffs' experts' reports as hearsay. Defendants' objections are especially ironic given that they seek to introduce a 390-page report written by their expert, Stacey Moss, as well as supporting documents from the report. *See* ECF No. 373 at 2, 16, 18-19. Defendants also seek to introduce all their experts' curriculum vitae. *See id.* at 9. Moreover, Defendants are selective in their objections to the expert reports that Plaintiffs seek to introduce. *See* ECF No. 421 at 4.

Plaintiffs' experts' reports are admissible evidence pursuant to FRE 703, "which merely permits such hearsay, or other inadmissible evidence, upon which an expert properly relies, to be

¹ Plaintiffs inadvertently included four duplicate exhibits in their exhibit list, which is why there are 441 exhibits listed. Additionally, Plaintiffs filed an amended exhibit list on April 23 that contains 490 exhibits. *See* ECF No. 403. Defendants state that their objections to these exhibits are forthcoming. *See* ECF No. 421 at 2.

admitted to explain the basis of the expert's opinion." *Paddack v. Dave Christensen, Inc.*, 745 F.2d 1254, 1261–62 (9th Cir. 1984). In evaluating Plaintiffs' experts' testimony, the Court should have the opportunity to review their reports, which contain the factual basis for their opinions.

For example, Dr. Sue Steib and Patricia Rideout's opinions are based on a review of the named Plaintiffs' case files, *see* Pls. Ex. 2, and 95 additional children's case files, *see* Pls. Ex. 3. Their expert reports provide the factual basis for their opinions, which the Court must have access to in order to evaluate the reliability of their testimony and conclusions. It would be impractical and a waste of judicial resources for the Court to review the tens of thousands of pages contained in the case files, and therefore, the experts' reports are necessary to provide the relevant factual information. In the case of Dr. Anne Farina, her expert reports are based on interviews with foster children at various facilities in Oregon, among other information. *See* Pls. Exs. 7 and 8. Her particular approach was pre-approved by the Court after substantial argument, specifically to avoid Plaintiffs having to call several foster youth to testify or the Court conducting site visits. Plaintiffs are unable to reasonably present the testimony of these children without substantially elongating the trial and risking further traumatizing the young children whom Dr. Farina spoke with. Dr. Farina's expert report, therefore, will provide the Court with information about the facts she relied on in reaching her conclusions. The same is true of Plaintiffs' other experts and their respective reports.

At a minimum, Plaintiffs' experts' reports may be used to refresh their recollections. Plaintiffs' experts' curriculum vitae, which are attached to each expert's report, are also admissible as they will allow the Court to evaluate the experts' credentials and opinions.

4. Defendants object to exhibits that contain email exchanges between and among individual Defendants, Department of Human Services' employees, and/or the Governor or her

staff. They also object to emails that contain statements made by individuals who will testify at trial. These exhibits are not hearsay as the statements contained therein were made by either one or more Defendants, Defendants' "agent or employee on a matter within the scope of that relationship and while it existed," *see* FRE 801(d)(2), or an individual who will testify at trial, *see* FRE 801(d)(1). Emails that do not include statements made by these individuals are not being offered to prove the truth of the matter asserted. Additionally, some of the emails contain statements of a public office, qualifying them as public records under FRE 803(8) as Defendants have failed to "show that the source of information or other circumstances indicate a lack of trustworthiness." FRE 803(8)(b).

5. Defendants object to nearly all documents that Defendants produced to Plaintiffs in discovery and in response to Plaintiffs' various requests to produce. These include datasheets, reports, and documents created by the Department of Human Services; Oregon Child and Family Service Reviews ("CFSR") Debrief Summary Notes and Analysis reports; Sensitive Issue Reports, and reports created by other public, recognized entities, such as the Oregon Health Authority and Annie E. Casey Foundation. Defendants object to these exhibits on multiple grounds, including hearsay pursuant to FRE 803 and authentication pursuant to FRE 901. Defendants' inexplicable decision not to object to some exhibits falling within these categories undermines the genuineness of their objections.

These exhibits are not hearsay as they are either records of regularly conducted activity, *see* FRE. 803(6), public records, *see* FRE 803(8), not being introduced for the truth of the matter, or otherwise admissible. If necessary, Plaintiffs can call Department of Human Services representatives and representatives from the various agencies that authored the documents to testify in accordance with FRE 803(6) or (8), depending on which exception applies. In the interest

of time and judicial resources, however, Plaintiffs ask that the Court find these documents admissible and not require Plaintiffs to call multiple custodians for this purpose.

Additionally, these exhibits are self-authenticating pursuant to FRE 902, as they are either public documents, official publications, or records or data generated from electronic systems. *See* FRE 902(2)(5)(13)(14). Plaintiffs ask that the Court find these documents to be self-authenticating without requiring Plaintiffs to call custodians to testify to as much.

Defendants are responsible for creating and producing these documents to Plaintiffs, and in some instances to the public, legislature, or federal government as well, and their objections based on the documents' authenticity and unreliability are thus disingenuous and strange. Plaintiffs' maintain that these exhibits are per se admissible, and that in the interest of saving time and judicial resources, the Court should admit them without requiring Plaintiffs' to call numerous representatives from the Department of Human Services and other agencies to authenticate Defendants' own documents.

6. Defendants object to several of Plaintiffs' exhibits stating, "Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403." As this is a bench trial, there is little risk that the Court will consider information that is unfairly prejudicial or confusing. *See, e.g., United States v. Caudle*, 48 F.3d 433, 435 (9th Cir. 1995) ("[I]t would be most surprising if such potential prejudice had any significance in a bench trial."). Additionally, Plaintiffs' Specific Responses explain the relevance of the objected-to exhibits.

SPECIFIC RESPONSES

Plaintiffs provide the following Specific Responses to Defendants' objections and incorporate the General Responses mentioned above where applicable.

Ex.	Description	Stip.	Objections	Responses
1	2/5/2024 Memorandum from Fariborz Pakseresht to Senate Human Services Committee re Responses to questions regarding Child Welfare contractors, temporary lodging and litigation		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.	<ul style="list-style-type: none"> • Relevant to and highly probative of factual and legal issues, including deliberate indifference, temporary lodging, provision of services, and maltreatment in care, among others. • See General Response Nos. 1 and 6.
2	Expert Report of Patricia Rideout and Dr. Sue Steib 11/30/2019		Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III.A.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 3.
3	Amended Expert Report of Patricia Rideout and Dr. Sue Steib 2/2/2024		Inadmissible for the reasons explained in Defendants' Daubert	<ul style="list-style-type: none"> • See General Response Nos. 2 and 3.
4	Expert Rebuttal Report of Patricia Rideout and Dr. Sue Steib 3/1/2024		Inadmissible for the reasons explained in Defendants' Daubert motion. Hearsay. FRE 802.	<ul style="list-style-type: none"> • See General Response Nos. 2 and 3.
5	Expert Report of Dr. Angelique Day 11/27/2019		Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.D.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 3.
6	Expert Report of Dr. Angelique Day 12/15/2023		Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.D.	<ul style="list-style-type: none"> • See General Response Nos. 2 and 3.
7	Expert Report of Dr. Anne Farina 12/15/2023		Hearsay. FRE 802.	<ul style="list-style-type: none"> • See General Response No. 3.
8	Expert Rebuttal Report of Dr. Anne Farina 3/1/2024		Hearsay. FRE 802.	<ul style="list-style-type: none"> • See General Response No. 3.

9	Expert Rebuttal Report of Albyn Jones 3/1/2024		Inadmissible for the reasons explained in Defendants' Daubert motion. Hearsay. FRE 802.	<ul style="list-style-type: none"> • See General Response Nos. 2 and 3.
10	Expert Report of Alan M. Puckett 11/28/2019		Hearsay. FRE 802.	<ul style="list-style-type: none"> • See General Response No. 3.
11	Expert Report of Dr. Bianca Wilson 12/1/2019		Hearsay. FRE 802.	<ul style="list-style-type: none"> • See General Response No. 3.
12	Wyatt B. Complaint		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.	<ul style="list-style-type: none"> • The complaint is not being offered for the truth of the matter asserted and thus is not hearsay. It is probative of Defendants' awareness of the problems in Oregon's child welfare system, which is relevant to providing deliberate indifference.
13	Plaintiffs' 15th RFP		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III.A.	<ul style="list-style-type: none"> • The RFP is relevant to understanding the testimony of Plaintiffs' experts Dr. Steib and Ms. Rideout, who will testify about their review 95 foster children's case files that they received pursuant to this RFP. • See General Response No. 1.
14	Plaintiffs' 16th RFP		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A., III.A.	<ul style="list-style-type: none"> • The RFP is relevant to understanding the testimony of Plaintiffs' experts Dr. Steib and Ms. Rideout, who will testify about their review 95 foster children's case files that they received pursuant to this RFP. • See General Response No. 1.
15	12/7/2021 Email exchange re CANS information		Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response No. 4
16	12/8/2021 Email exchange re OR CANS information		Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response No. 4

17	12/8/2021 Email exchange re OR CANS information		Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response No. 4
18	12/9/2021 Email exchange re OR CANS Information		Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response No. 4
19	Department of Administrative Services Insurance Fund Presentation 2/14/2024		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion VII.	<ul style="list-style-type: none"> • This exhibit is relevant to establishing deliberate indifference, among other aspects of Plaintiffs' claims. • See General Response Nos. 1 and 5.
20	2023 Public Knowledge Report: Oregon Child Welfare Review Draft Assessment Findings Report 12/15/2024	Stip.	No objection.	
21	Public Knowledge Focus Group Notes		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.	<ul style="list-style-type: none"> • These notes provide a basis for the Public Knowledge Report, the introduction of which Defendants have not objected to and have also sought. The notes are highly relevant to Defendants' expert, Stacey Moss's, testimony and to the Court's ability to evaluate it. They are also relevant to issues including staffing, services, placements, and others. Moreover, Defendants' exhibit list includes at least four exhibits comprised of Plaintiffs' experts' typed and handwritten notes. See ECF No.373 at 15. • See General Response No. 6.

22	Stacey Moss 3/18/2024 Deposition Transcript at: Exs. 2 & 4 to Stacey Moss Deposition		<p>Deposition transcript: Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Improper impeachment. FRE 602. - Ex. 2 to the transcript: Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Improper impeachment. FRE 602. - Ex. 4 to the transcript: Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine. Authenticity. FRE 901.</p>	<ul style="list-style-type: none"> • The exhibit is highly relevant to Defendants' expert Stacey Moss's testimony, credibility, and findings. • Defendants seek to introduce Stacey Moss's expert report and other documents on which she relied. Plaintiffs should not be precluded from doing the same if the Court chooses to admit Defendants' exhibits. • Ms. Moss's deposition transcript is admissible for impeachment purposes and as statements of a testifying witness.
23	Public Knowledge Interview Notes		<p>Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.</p>	<ul style="list-style-type: none"> • These notes provide a basis for the Public Knowledge Report, the introduction of which Defendants have not objected to and have also sought. The notes are highly relevant to Defendants' expert, Stacey Moss's, testimony and to the court's ability to evaluate it. They are also relevant to issues including staffing, services, placements, and other issues. Moreover, Defendants' exhibit list includes at least four exhibits comprised of Plaintiffs' experts' typed and handwritten notes. • See General Response No. 6.

24	CFSR Self-Assessments - Statewide Chart		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Inadmissible because contents summarized do not meet the requirements for a summary exhibit. FRE 1006. Authenticity. FRE 901.	<ul style="list-style-type: none"> • Exhibit is highly probative of numerous issues in this case, including maltreatment in care, services, permanency, case planning, among others, and is not in any way prejudicial. • The underlying documents summarized are voluminous and have been provided and thus this exhibit is admissible pursuant to FRE 1006. • See General Response No. 6.
25	D10 2018 CFSR Charts	Stip.	No objection.	
26	D10 2019 CFSR Charts	Stip.	No objection.	
27	D10 2020 CFSR Charts	Stip.	No objection.	
28	D10 2021 CFSR Charts	Stip.	No objection.	
29	D10 2022 CFSR Charts	Stip.	No objection.	
30	D10 2023 CFSR Charts	Stip.	No objection.	
31	Number of Children in Foster Care or being Served In Home on April 1, 2022 by Worker Assignment, Worker County, Worker Role, and Worker Type		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.	<ul style="list-style-type: none"> • This exhibit demonstrates caseworker caseloads and is thus relevant to myriad trial issues, including common questions this Court has certified. • See General Response Nos. 5 and 6.
32	Number of Children in Foster Care or being Served In Home on		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues.	<ul style="list-style-type: none"> • This exhibit demonstrates caseworker caseloads and is thus

	Jan. 1, 2022 by Worker Assignment, Worker County, Worker Role, and Worker Type		FRE 403. Hearsay. FRE 802.	relevant to myriad trial issues, including common questions this Court has certified. • See General Response Nos. 5 and 6.
33	Number of Children in Foster Care or being Served In Home on April 1, 2021 by Worker Assignment, Worker County, Worker Role, and Worker Type		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.	• This exhibit demonstrates caseworker caseloads and is thus relevant to myriad trial issues, including common questions this Court has certified. • See General Response Nos. 5 and 6.
34	Number of Children in Foster Care or being Served In Home on Jan 1, 2021 by Worker Assignment, Worker County, Worker Role, and Worker Type		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.	• This exhibit demonstrates caseworker caseloads and is thus relevant to myriad trial issues, including common questions this Court has certified. • See General Response Nos. 5 and 6.
35	2018 Oregon Secretary of State Audit of ODHS	Stip.	No objection.	
36	OR Secretary of State Audit of ODHS 2019: Recommendation Follow-up Report: DHS Has Made Important Improvements, but Extensive Work Remains to Ensure Child Safety	Stip.	No objection.	
37-85	Exhibits 37-85 are Child Welfare monthly debrief summaries produced by Defendants in		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Original writing	• The exhibits are CFSR reviews that DHS conducted, created, and produced. They are relevant to myriad trial

	discovery. Defendants make identical objections to all the summaries.		is required to prove contents. FRE 1002.	issues, including maltreatment in care, services, permanency, case planning, among others, and is not in any way prejudicial. • FRE 1002 does not apply to these exhibits. • See General Response Nos. 5 and 6.
86	8/10/2018 Email from Rosa Klein to Kate Brown et al.		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.	• FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional. • The exhibit is relevant to establishing deliberate indifference. • See General Response No. 4.
87	Foster Care Recruitment & Retention	Stip.	No objection	
88	8/26/2019 Email from Fariborz Pakseresht to SEIU 503		Hearsay. FRE 802.	• See General Response No. 4.
89	Oregon Department of Human Services, Child Welfare Progress Report	Stip.	No objection	
90	6/28/2021 Email exchange between Megan Brazo-Erickson to RJG, Lacey Andresen, et al.		Hearsay. FRE 802. Best evidence rule. FRE 1002.	• See General Response No. 4.
91	1/5/2022 Email exchange between April Munks and Lacey Andresen		Hearsay. FRE 802.	• See General Response No. 4.

92	1/26/2022 Email exchange between Timothy Gillette and Eric Moore, et al.		Hearsay. FRE 802.	• See General Response No. 4.
93	4/5/2022 Email exchange between Diepen-Hedyat Anandi and Tova Woyciechowicz		Hearsay. FRE 802.	• See General Response No. 4.
94	6/22/22 Email exchange between April Munks and Lacey Andresen, Aprille Flint-Gerner, et al.		Hearsay. FRE 802.	• See General Response No. 4.
95	Oregon Caseload Ratio Standards Feb 3, 2022	Stip.	No objection	
96	11/21/2022 Email exchange between Lacey Andresen, Amber McClelland, et al.		Hearsay. FRE 802.	• See General Response No. 4.
97	June 19, 2019 Email exchange between Rosa Klein and Mary Moller, Berri Lesli, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Undisclosed expert testimony. FRE 702. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.B.	<ul style="list-style-type: none"> • The exhibit is highly relevant to myriad issues in this case, including staffing, permanency, aging out, workload, and maltreatment in care, among others. • This exhibit does not constitute expert testimony. • See General Responses Nos. 1 and 4.
98	9/20/2019 Email exchange between Kim Lorz and Morton McKenzie, Lisa Lewis, et al.		Hearsay. FRE 802.	• See General Response No. 4.

99	8/23/2019 Email exchange between Fariborz Pakseresht and Liesl Wendt		Hearsay. FRE 802. Best evidence rule. FRE 1002.	• See General Response No. 4.
100	2/12/2020 Email exchange between RJG, Jana Mclellan, Fariborz, Deena Loughary, Lacey Andresen, et al.		Hearsay. FRE 802.	• See General Response No. 4.
101	1/6/2022 Email exchange between Kevin Marks Hess and Kristin Khamnohack, Lacey Andresen, et al.		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802.	• See General Response No. 4.
102	2/17/22 Email exchange between Lacey Andresen and April Munks, Rebecca Jones Gaston, et al.		Hearsay. FRE 802.	• See General Response No. 4.
103	2/14/22 Email exchange between April Munks and Cherly Baldomarolucas et al.		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802.	• See General Response No. 4. • FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional.
104	5/13/2022 Email exchange between Lacey Andresen, Timothy Gillette, RJG, Aprille Flint-Gerner, et al		Hearsay. FRE 802.	• See General Response No. 4.
105	Email exchange between Lacey Andresen, RJG, April Munks, et al.		Hearsay. FRE 802.	• See General Response No. 4.

106	Agency Budget Request Section 2 2023- 2025	Stip.	No objection	
107	Email from Darin Mancuso to Fariborz Pakseresht, Deena Loughary, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion II.	<ul style="list-style-type: none"> • See General Response No. 4.
108	Temporary Lodging Progress Report Jan 3, 2023		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.	<ul style="list-style-type: none"> • This exhibit is highly relevant to substantive due process rights of the plaintiff class and certified common questions, including whether Defendants maintain a deficiency of appropriate placements, among other issues. • See General Response Nos. 1 and 5.
109	1/4/2023 Email exchange between Fariborz Pakseresht, Lacey Andresen, et al.		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.	<ul style="list-style-type: none"> • FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional. • See General Response Nos. 1 and 4.
110	1/13/2023 Email exchange between Laura Winchester and Susana Dietrich		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the issues of turnover, staffing, and caseloads, among others. • See General Response Nos. 1 and 4.

111	1/4/2023 Email exchange between Darin Mancuso, Deena Loughary		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion 1.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the issues of turnover, staffing, and caseloads, among others. • See General Response Nos. 1 and 4.
112	Percentage of adults receiving required monthly face-to-face visits		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.	<ul style="list-style-type: none"> • This exhibit is highly relevant to myriad of issues at trial, including caseloads, staffing, permanency, and services, among others. • DHS created and produced this document based on its own internal data. • See General Response Nos. 5 and 6.
113	Caseworker visits with adults		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.	<ul style="list-style-type: none"> • This exhibit is highly relevant to myriad of issues at trial, including caseloads, staffing, permanency, and services, among others. • See General Response Nos. 5 and 6.
114	ODHS CFSP 2020-2024	Stip.	No objection	
115	3/29/2021 Email exchange between Lacey Andresen, Lee Brown, et al.		Hearsay. FRE 802. Best evidence rule. FRE 1002.	<ul style="list-style-type: none"> • See General Response No. 4. • FRE 1002 is not applicable. The exhibit depicts the original email as Defendants produced it to Plaintiffs.
116	7/27/2021 Email exchange between Lacey Andresen, and field program managers		Hearsay. FRE 802. Best evidence rule. FRE 1002.	<ul style="list-style-type: none"> • See General Response No. 4. • FRE 1002 is not applicable. The exhibit depicts the original email as Defendants produced it to Plaintiffs.

117	12/1/2021 Email exchange between Lacey Andresen and field program managers		Hearsay. FRE 802. Best evidence rule. FRE 1002.	<ul style="list-style-type: none"> • See General Response No. 4. • FRE 1002 is not applicable. The exhibit depicts the original email as Defendants produced it to Plaintiffs.
118	Number of initial Permanency Plans w/in 60 days of FC by entry month, trend data	Stip.	No objection	
119	Number of initial Permanency Plans w/in 60 days of FC by entry month, trend data	Stip.	No objection	
120	ODHS CW Progress Report Mar 2024	Stip.	No objection	
121	Invoices for Dynamic Life Planning Sessions		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • This exhibit is relevant to the issues of temporary lodging, deliberate indifference, maltreatment in care, and placements, among others. • Defendants produced this record to Plaintiffs in discovery, purportedly as a true and accurate copy of an invoice DHS received and in response to Plaintiffs' request for production. • See General Response No 5.

122	11/14/2023 Email exchange between Michelle Pfeiffer and Lacey Andresen et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.	<ul style="list-style-type: none"> • This exhibit is relevant to the issues of temporary lodging, deliberate indifference, maltreatment in care, and placements, among others. • <i>See</i> General Response No. 4.
123	12/5/2023 OPB Article		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • This exhibit is relevant to the issues of temporary lodging, deliberate indifference, maltreatment in care, and placements, among others. • The exhibit is self-authenticating. <i>See</i> FRE 902(6).
124	2/29/2024 OPB Article		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • This exhibit is relevant to the issues of temporary lodging, deliberate indifference, maltreatment in care, and placements, among others. • The exhibit is self-authenticating. <i>See</i> FRE 902(6).
125	3/1/2024 Email exchange between Michelle Pfeiffer and Senator Gelser et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.	<ul style="list-style-type: none"> • This exhibit is relevant to the issues of temporary lodging, deliberate indifference, maltreatment in care, and placements, among others. • <i>See</i> General Response No. 4.
126	3/1/2024 Email exchange between Michelle Pfeiffer and Senator Gelser et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.	<ul style="list-style-type: none"> • This exhibit is relevant to the issues of temporary lodging, deliberate indifference, maltreatment in care, and placements, among others. • <i>See</i> General Response No. 4.

127	DHS Child Welfare After Action Report: A Review of Contracting with Dynamic Life		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.	<ul style="list-style-type: none"> • This document bears the Department of Human Service's letterhead and the Governor's name. The exhibit also constitutes a public record. <i>See</i> FRE 803(8). • <i>See</i> General Response No. 1.
128	Sensitive Issue Reports Compilation		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion II.	<ul style="list-style-type: none"> • This exhibit is highly relevant to the issue of maltreatment in care and deliberate indifference, among others. • <i>See</i> General Response Nos. 1 and 5.
129	Summary of temporary lodging settlement agreement		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Prohibited use of settlement agreement. FRE 408. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.	<ul style="list-style-type: none"> • This exhibit is relevant to the issues of temporary lodging, placements, and deliberate indifference, among others. • FRE 408 is not applicable as Plaintiffs do not intend to use this evidence for the improper purposes described therein. • <i>See</i> General Response Nos. 1, 5, and 6.
130	Slide deck from 8/15/2018 on temporary lodging and the settlement		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Prohibited use of settlement agreement. FRE 408. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants'	<ul style="list-style-type: none"> • This exhibit is highly relevant to temporary lodging, placements, safety, and deliberate indifference, among other issues. • FRE 408 is not applicable as Plaintiffs do not intend to use this evidence for the improper purposes described therein.

			Motions in Limine, including Motion V	<ul style="list-style-type: none"> Defendants produced this document to Plaintiffs in discovery purportedly as a true and accurate copy of a record kept by Defendants. Additionally, Defendants' hearsay and authentication objections are ironic given that Defendants' exhibit list contains multiple presentations that they intend to introduce at trial. <i>See</i> General Response Nos. 1 and 6.
131	Datasheet Count of Children/Young Adults in Foster Care by Lifetime Temporary Lodging occasions through the end of the period		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.	<ul style="list-style-type: none"> This exhibit is highly relevant to temporary lodging, placements, and permanency, among other issues. <i>See</i> General Response Nos. 1, 5, and 6.
132	Datasheet Children/Young Adults exiting from foster care during the reporting period by count of total occasions during the foster care episode		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions 1.A., 1.B, I.C., and V .	<ul style="list-style-type: none"> This exhibit is highly relevant to the issue of permanency, among other issues. <i>See</i> General Response Nos. 1, 5, and 6.
133	Datasheet on days spent in temporary lodging for those in custody on 1/31/22		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair	<ul style="list-style-type: none"> This exhibit is highly relevant to permanency and temporary lodging, among other issues. <i>See</i> General Response Nos. 1, 5, and 6.

			<p>prejudice and confusion of issues. FRE 403.</p> <p>Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.</p>	
134	November 2022 Temporary Lodging report		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403.</p> <p>Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.</p>	<ul style="list-style-type: none"> • This exhibit is highly relevant to permanency and temporary lodging, among other issues. • See General Response Nos. 1, 5, and 6.
135	November/December 2022 Temporary Lodging Report		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.</p>	<ul style="list-style-type: none"> • The exhibit is highly relevant to permanency and temporary lodging, among other issues. • See General Response Nos. 1, 5, and 6.
136	Letter to Judge McShane re Temporary Lodging numbers		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.</p>	<ul style="list-style-type: none"> • The exhibit is highly relevant to permanency, temporary lodging, and deliberate indifference, among other issues. Additionally, Defendants intend to call at least one witness who will testify about these issues at trial. • The exhibit is a letter submitted to the U.S. District Court for the District of Oregon and bears the Department of Human Services letterhead. • See General Response Nos. 1 and 5.

137	Temporary Lodging Report to McShane		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.</p>	<ul style="list-style-type: none"> • The exhibit is highly relevant to permanency, temporary lodging, and deliberate indifference, among other issues. Additionally, Defendants intend to call at least one witness who will testify about these issues at trial. • The exhibit is a letter submitted to the U.S. District Court for the District of Oregon and bears the Department of Human Services letterhead. The document was produced to Plaintiffs in discovery and the Court should find it is per se admissible. • See General Response Nos. 1 and 5. The exhibit also contains statements of a party opponent.
138	Temporary Lodging Report to McShane		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.</p>	<ul style="list-style-type: none"> • The exhibit is highly relevant to permanency, temporary lodging, and deliberate indifference, among other issues. Additional, Defendants intend to call at least one witness who will testify about these issues at trial. • The exhibit is a letter submitted to the U.S. District Court for the District of Oregon and bears the Department of Human Services letterhead. The document was produced to Plaintiffs in discovery and the Court should find it is per se admissible. • See General Response Nos. 1 and 5. The exhibit also contains statements of a

				party opponent.
139	Temporary Lodging Report to McShane		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.	<ul style="list-style-type: none"> • The exhibit is highly relevant to permanency, temporary lodging, and deliberate indifference, among other issues. Additionally, Defendants intend to call at least one witness who will testify about these issues at trial. • The exhibit is a letter submitted to the U.S. District Court for the District of Oregon and bears the Department of Human Services letterhead. The document was produced to Plaintiffs in discovery and the Court should find it is per se admissible. • See General Response Nos. 1 and 5. The exhibit also contains statements of a party opponent.
140	Temporary Lodging Report to McShane		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.	<ul style="list-style-type: none"> • The exhibit is highly relevant to permanency, temporary lodging, and deliberate indifference, among other issues. Additionally, Defendants intend to call at least one witness who will testify about these issues at trial. • The exhibit is a letter submitted to the U.S. District Court for the District of Oregon and bears the Department of Human Services letterhead. The document was produced to Plaintiffs in discovery and

				<p>the Court should find it is per se admissible.</p> <ul style="list-style-type: none"> • <i>See</i> General Response Nos. 1 and 5. The exhibit also contains statements of a party opponent.
141	Temporary Lodging Report to McShane		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.</p>	<ul style="list-style-type: none"> • The exhibit is highly relevant to permanency, temporary lodging, and deliberate indifference, among other issues. Additionally, Defendants intend to call at least one witness who will testify about these issues at trial. • The exhibit is a letter submitted to the U.S. District Court for the District of Oregon and bears the Department of Human Services letterhead. The document was produced to Plaintiffs in discovery and the Court should find it is per se admissible. • <i>See</i> General Response Nos. 1 and 5. The exhibit also contains statements of a party opponent.
142	Temporary Lodging Report to McShane		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.1 Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.</p>	<ul style="list-style-type: none"> • The exhibit is highly relevant to permanency, temporary lodging, and deliberate indifference, among other issues. Additional, Defendants intend to call at least one witness who will testify about these issues at trial. • The exhibit is a letter submitted to the U.S. District Court for the District of Oregon and bears the Department of Human Services letterhead. The document was produced to

				<p>Plaintiffs in discovery and the Court should find it is per se admissible.</p> <ul style="list-style-type: none"> • <i>See</i> General Response Nos. 1 and 5. The exhibit also contains statements of a party opponent.
143	Special Master's Recommendations for Addressing Temporary Lodging		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.</p>	<ul style="list-style-type: none"> • The exhibit is highly relevant to permanency, temporary lodging, and deliberate indifference, among other issues. Additionally, Defendants intend to call at least one witness who will testify about these issues at trial. • The exhibit a public record pursuant to FRE 803(8). It was also produced to Plaintiffs in discovery, submitted to the Court, and bears the Department of Human Services Letterhead. <i>See</i> General Response Nos. 1 and 5.
144	1/19/2018 Email exchange between Laurie Theororou, Nancy Allen, et al.		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.</p>	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, services, maltreatment in care, and deliberate indifference, among other issues. • <i>See</i> General Response Nos. 1 and 4.
145	1/26/2018 Email exchange between Glenda Marshall, Nancy Allen, et al.		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.,</p>	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, services, and deliberate indifference, among other issues. • <i>See</i> General Response Nos. 1 and 4.

146	ORRAI Capacity Needs Report	Stip.	No objection	
147	Email exchange between Marty Herbert, Nancy Allen, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.,	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, services, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
148	7/26/2019 Email from Jake Sunderland to Jana McLellan et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.,	<ul style="list-style-type: none"> • The exhibit is highly relevant to visits, child safety, placements, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
149	9/3/2019 Email from Katrina Husbands to Kimberly Young		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, recruitment, services, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
150	9/23/2019 Email from Angela Leet to Sara Fox		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA Subclass's claims, placements, services, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
151	11/1/2019 Email exchange with all staff		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion	<ul style="list-style-type: none"> • The exhibit is highly relevant to maltreatment in care, placements, services, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.

			I.A.	
152	12/4/2019 Email exchange between Glenda Marshall, Angela Leet, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA Subclass's claims, placements, services, and deliberate indifference, among other issues. • See General Objection Response Nos. 1 and 4.
153	Secretary of State OHA Audit Mental Health Treatment		Hearsay. FRE 802.	<ul style="list-style-type: none"> • See General Response No. 5.
154	Datasheet ODHS Certified Resource Homes on the first day of the quarter and those with no children placed with provider in the previous 6 months		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A. and V.	<ul style="list-style-type: none"> • The exhibit is highly relevant to certifications of foster homes, placements, and child safety, among other issues. See General Response Nos. 1, 5, and 6.
155	Datasheet ODHS Certified Homes on the first day of the period and those with no children placed in the home		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A. and V.	<ul style="list-style-type: none"> • The exhibit is highly relevant to certifications of foster homes, placements, and child safety, among other issues. See General Response Nos. 1, 5, and 6.

156	Datasheet CM.09 Placement in Same or Adjoining County-of those in care		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, the AACWA claims, and child wellbeing, among other issues. • See General Response Nos. 1, 5, and 6
157	BRS Beds PowerPoint and datasheet	Stip.	No objection	
158	6/22/2022 Email exchange between Sarah Fox, Lacey Andresen, et al.		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA Subclass's claims, placements, capacity, and staffing, among other issues. • FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional. • See General Response Nos. 1 and 4.
159	Datasheet on capacity overrides		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is relevant to services, the ADA Subclass's claims, capacity, and placements, among other issues. • See General Response Nos. 1, 5, and 6.

160	Statewide Quarterly Data Report 20202022		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is relevant to services, the ADA Subclass's claims, capacity, and placements, among other issues. • <i>See</i> General Response Nos. 1, 5, and 6.
161	All DHS certified providers open first day of month between 2021 and 2022		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA Subclass's claims, placements, and capacity, among other issues. <i>See</i> General Response Nos. 1, 5, and 6. This document also states that it was created by ORRAI.
162	Placement map		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is relevant to the ADA Subclass's claims, placements, and services, among other issues. • <i>See</i> General Response Nos 1 and 5.
163	HB 2086 (2021) Report: Intensive Behavioral Health Treatment Services for Children and Adolescents: Capacity and Demand		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA Subclass's claims, placements, and services, among other issues. • <i>See</i> General Response Nos. 1 and 5. This exhibit is a report created by the Oregon Health Authority.
164	7/15/2018 Email exchange between Marilyn Jones, Shannon Biteng, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A. and I.C.	<ul style="list-style-type: none"> • The exhibit is highly relevant to permanency and deliberate indifference, among other issues. • <i>See</i> General Response Nos. 1 and 4.

165	5/17/2019 Email exchange between Sarah Fox, Rosa Klein, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A and VIII.	<ul style="list-style-type: none"> • The exhibit is highly relevant to maltreatment in care, placements, services, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
166	6/12/2019 Email exchange between Senator Gelser, Rosa Klein, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A and VIII.	<ul style="list-style-type: none"> • The exhibit is highly relevant to maltreatment in care, placements, services, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
167	6/4/2019 Email from David Schmidt to Christy Sinatra		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to maltreatment in care, placements, services, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
168	7/27/2022 Email exchange between Senator Gelser, Fariborz Pakseresht, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A. and VIII.	<ul style="list-style-type: none"> • The exhibit is relevant to the ADA Subclass's claims, congregate care, placements, services, maltreatment in care, and deliberate indifference. • See General Response Nos. 1 and 4.
169	Datasheet on congregate care placements		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to congregate care, placements, services, and the ADA Subclass's claims, among other issues. • See General Response Nos. 1, 5, and 6.

170	Datasheet on congregate care placements		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to congregate care, placements, services, and the ADA Subclass's claims, among other issues. • <i>See</i> General Response Nos. 1, 5, and 6
171	Datasheet Children in Foster Care on first day of quarter		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A. and V.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the number of children in care and the Aging Out Subclass's claims, among other issues. <i>See</i> General Response Nos. 1, 5, and 6.
172	Datasheet on children entering care each year		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the number of children in care, the ADA Subclass's claims, placements, and the Aging Out Subclass's claims, among other issues. • <i>See</i> General Response Nos. 1, 5, and 6
173	Datasheet on victims of Abuse while in foster care		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible	<ul style="list-style-type: none"> • The exhibit is highly relevant to the number of children in care, the ADA Subclass's claims, placements, and the Aging Out Subclass's claims, among other issues. <i>See</i> General Response Nos. 1, 5, and 6.

			for the reasons explained in Defendants' Motions in Limine, including Motions I.A., II, III.A., and V.	
174	Datasheet on Children in Foster Care on first day of quarter		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A .	<ul style="list-style-type: none"> • The exhibit is highly relevant to the number of children in care, the ADA Subclass's claims, placements, and the number of children in care, among other issues. It is highly probative of these issues and there is no risk of unfair prejudice and confusion. • See General Response Nos. 1, 5, and 6.
175	2021 CW Data Book	Stip.	No objection	
176	ODHS data		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Best evidence rule. FRE 1002.	<ul style="list-style-type: none"> • The exhibit is highly probative of Plaintiffs' claims regarding maltreatment in care, permanency, and the ADA Subclass's claims, among others, and there is no risk of confusion or unfair prejudice. • FRE 1002 does not apply. The exhibit is the original document created by the Department of Human Services and produced by Defendants in discovery. • See General Response Nos. 5 and 6.
177	Oregon Data	Stip.	No objection	
178	CFSR Data Profile R3 August 2022	Stip.	No objection	

179	CFSR Data Profile R3 February 2022	Stip.	No objection	
180	2023 Oregon Profile Casey Family		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.D.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the Aging Out Subclass's claims and services, among other issues. • The exhibit was created by the Annie E. Casey Foundation. In the interest of judicial resources and time, Plaintiffs should not be required to call a representative from the organization to authenticate the document. • See General Response Nos. 1 and 5. Additionally, Plaintiffs' expert relied on this in forming her opinions.
181	NYTD data snapshot Oregon 2016-2020		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.D.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the Aging Out Subclass's claims and services, among other issues. • The exhibit is from the National Youth in Transition Database. In the interest of judicial resources and time, Plaintiffs should not be required to call a representative from the organization to authenticate the document. • See General Response Nos. 1 and 5. Additionally, Plaintiffs' expert relied on this in forming her opinions.
182	NYTD data snapshot Oregon 2017-2021		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the Aging Out Subclass's claims and services, among other issues.

			Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.D.	<ul style="list-style-type: none"> • The exhibit is from the National Youth in Transition Database. In the interest of judicial resources and time, Plaintiffs should not be required to call a representative from the organization to authenticate the document. • See General Response Nos. 1 and 5. Additionally, Plaintiffs' expert relied on this in forming her opinions.
183	Email exchange between Lacey Andresen, Sherrelle Jackson, et al		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.D. and V.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA Subclass's claims, services, placements, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
184	Spreadsheet with Interview Output		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.	<ul style="list-style-type: none"> • The exhibit contains notes from Defendants' own expert, whom Defendants intend to call at trial and whose report is based in part on the survey responses in this document. It is probative of the myriad of issues covered in Defendants' expert's report and the expert's purported testimony. • See also General Response No. 5 and 6.
185	Chaffee graduation rates		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine,	<ul style="list-style-type: none"> • The exhibit is highly relevant to the Aging Out Subclass's claims and services, among other things. • See General Response Nos. 1 and 5.

			including Motion I.D.	
186	4/15/2021 Email exchange between Elisa Deserano, Lacey Andresen, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.D.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the Aging Out Subclass's claims, services, maltreatment in care, placements, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
187	2/7/2023 ACF letter		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 187. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.D.	<ul style="list-style-type: none"> • The exhibit is highly relevant to deliberate indifference and the Aging Out Subclass's claims, among other issues. • The exhibit is a letter signed by members of the Children's Bureau to Fariborz Pakseresht, who will be testifying at trial. See General Response Nos. 1 and 5.
188	Call data		Hearsay. FRE 802.	<ul style="list-style-type: none"> • See General Response No. 5. Moreover, Defendants intend to present excessive testimony and evidence related to the hotline.
189	Call wait-time data		Hearsay. FRE 802.	<ul style="list-style-type: none"> • See General Response No. 5. Moreover, Defendants intend to present excessive testimony and evidence related to the hotline.
190	Datasheet on founded CPS Assessments		Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.	<ul style="list-style-type: none"> • The exhibit is highly probative of maltreatment in care and staffing, among other issues. • See General Response Nos. 5 and 6.

191	Data on overdue Assessments		Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response No. 5.
192	2024 APSR	Stip.	No objection	
193	May 2022 CPS Fidelity Statewide Report	Stip.	No objection	
194	ODHS 2023-25 POP Child Safety	Stip.	No objection	
195	Planning for Reunification and Meeting Expected Outcomes		Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response No. 5. This exhibit is part of the Department of Human Service's own training curriculum.
196	7/12/2019 Email exchange between Tami Kane-Suleiman and Greg Westbrooks, et al.		Hearsay. FRE 802.	<ul style="list-style-type: none"> • See General Response No. 4.
197	8/27/2019 Email exchange between Sen Gelser, Remmal Nivens, et al.		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403.</p> <p>Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A. and VIII.</p>	<ul style="list-style-type: none"> • The exhibit its highly relevant to maltreatment in care, deliberate indifference, and placements, among other issues. • See General Response Nos. 1, 4, and 6.
198	Oregon Child Integrated Dataset		<p>Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403.</p> <p>Hearsay. FRE 802. Best evidence rule. FRE 1002.</p>	<ul style="list-style-type: none"> • The exhibit is highly probative of maltreatment in care, harm to children, and services, among other issues and there is no risk of unfair prejudice or confusion. • See General Response Nos. 1, 5, and 6. • FRE 1002 does not apply. The exhibit is a report

				created by the Oregon Child Integrated Dataset and the original document produced by Defendants in discovery.
199	Email exchange between Rebecca Jones-Gaston, Fariborz, et al.		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802.	<ul style="list-style-type: none"> • See General Response No. 4. • FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional.
200	9/28/2021 Email exchange between Fariborz, Lacey Andresen, et al.		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions II and III.A.	<ul style="list-style-type: none"> • FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional. • The exhibit is highly relevant to maltreatment in care and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
201	2/4/2022 Email exchange between Sen Gelser, Lacey Andresen, et al.		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802.	<ul style="list-style-type: none"> • FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional. • See General Response No. 4.
202	CIRT datasheet	Stip.	No objection	
203	CFSR 3	Stip.	No objection	
204	ODHS Child Welfare Dashboard		This document has not been provided to defendants. Defendants reserve the right to object if it is provided.	<ul style="list-style-type: none"> • Plaintiffs informed Defendants that they wish to confer on how to best present evidence from this online dashboard at trial. Defendants included screenshots from this dashboard in their exhibit list.
205	Article: Oregon DHS report admits missteps		Not relevant because it does not tend to make any fact of	<ul style="list-style-type: none"> • This exhibit is relevant to maltreatment in care,

	in foster kid care, but lawmaker says that's not enough		consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.	deliberate indifference, and placements, among others. • The exhibit is self-authenticating. <i>See</i> FRE 902(6).
206	Service Delivery Data Report Midtown Child Welfare 2024	Stip.	No objection	
207	Absence of repeated maltreatment chart		Best evidence rule. FRE 1002.	• FRE 1002 is inapplicable. The exhibit is a document created by the Department of Human Services and the original document produced by Defendants in discovery. <i>See also</i> General Response No. 5.
208	8/23/2022 Email exchange between Lacey Andresen, Cathy Iles, et al.		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802.	• FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional. • <i>See</i> General Response No. 4
209	Datasheet on foster care visits		Hearsay. FRE 802.	• <i>See</i> General Response No. 5.
210	10/31/2019 Email from David Schmidt to Jeff Pinelli et al		Hearsay. FRE 802.	• <i>See</i> General Response No. 4.
211	Caseload optimization for improved child outcomes and workload equity	Stip.	No objection	
212	11/2/2021 Email exchange between Kody Cayson and Paul Bellatty et al		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802.	• FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional. • <i>See</i> General Response No. 4.

213	Datasheet on discharges		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403.</p> <p>Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.B.</p>	<ul style="list-style-type: none"> • The exhibit is highly relevant to permanency and Plaintiffs' right to treatment and care consistent with the purpose and assumptions of government custody, among other issues. prejudice or confusion. • See General Response Nos. 1, 5, and 6.
214	Datasheet on time in care		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403.</p> <p>Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.B.</p>	<ul style="list-style-type: none"> • The exhibit is highly relevant to permanency and Plaintiffs' right to treatment and care consistent with the purpose and assumptions of government custody, among other issues. • See General Response Nos. 1, 5, and 6.
215	OR CFSR Round 3 - PIP	Stip.	No objection	
216	Chart on disparities in length of stay		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Best evidence rule. FRE 1002.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.B.</p>	<ul style="list-style-type: none"> • The exhibit is highly relevant to permanency, disparities in care, and Plaintiffs' right to treatment and care consistent with the purpose and assumptions of government custody, among other issues. • FRE 1002 does not apply. The exhibit is a report created by the Department of Human Services and is the original document produced by Defendants in discovery. • See General Response Nos. 1 and 5.

217	8/23/2022 Email exchange between Cathy Iles, Alex Trotter et al.		Plaintiffs have represented that Ex. 217 is a duplicate of Ex. 208. Defendants incorporate the objection to Ex. 208 here and reserve the right to supplement this objection.	<ul style="list-style-type: none"> • <i>See</i> Plaintiffs' Responses to Defendants' Objections to Exhibit 208.
218	AFCARS Report Oregon FY 2022	Stip.	No objection	
219	AFCARS Report Oregon FY 2021	Stip.	No objection	
220	Datasheet on length of stay		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.B.	<ul style="list-style-type: none"> • The exhibit is highly relevant to permanency and the ADA Subclass's claims, among other issues. • FRE 1002 does not apply. The exhibit is a report created by the Department of Human Services and is the original document produced by Defendants in discovery. • <i>See</i> General Response Nos. 1, 5, and 6.
221	2020-2024 Child and Family Services Plan		Plaintiffs have represented that Ex. 221 is a duplicate of Ex. 114. Defendants incorporate the objection to Ex. 114 here and reserve the right to supplement this objection.	<ul style="list-style-type: none"> • <i>See</i> Plaintiffs' Responses to Defendants' Objections to Plaintiffs' Exhibit 114.
222	2021 ODHS APSR	Stip.	No objection	
223	5/20/2020 Email exchange between Rosa Klein and Kate Brown et al.		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Best evidence rule. FRE 1002. Inadmissible for the reasons explained in Defendants' Motions	<ul style="list-style-type: none"> • FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional. • The exhibit is highly relevant to deliberate indifference, placements, services, maltreatment in care, and permanency, among other issues.

			in Limine, including Motion I.A.	<ul style="list-style-type: none"> • <i>See</i> General Response Nos. 1 and 4.
224	Chart on timely adoptions		Best evidence rule. FRE 1002.	<ul style="list-style-type: none"> • FRE 1002 does not apply. The exhibit is a report created by the Department of Human Services and is the original document produced by Defendants in discovery. • <i>See also</i> General Response No. 5.
225	11/2/2021 Email exchange between Kody Cayson and Paul Bellatty et al.		Plaintiffs have represented that Ex. 225 is a duplicate of Ex. 212. Defendants incorporate the objection to Ex. 212 here and reserve the right to supplement this objection.	<ul style="list-style-type: none"> • <i>See</i> Plaintiffs' Responses to Defendants' Objections to Plaintiffs' Exhibit 212.
226	Datasheet on adoption		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.	<ul style="list-style-type: none"> • The exhibit is highly relevant to permanency, among other issues. <i>See</i> General Response Nos. 5 and 6.
227	Adoption Datasheet		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.	<ul style="list-style-type: none"> • The exhibit is highly relevant to permanency, among other issues. • <i>See</i> General Response Nos. 5 and 6.
228	Datasheet on trial home visits		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions	<ul style="list-style-type: none"> • This exhibit is highly relevant to the claims of the ADA Subclass and Aging Out Subclass, permanency, maltreatment in care, and services, among other issues. • <i>See</i> General Response Nos. 1, 5, and 6.

			in Limine, including Motion II.	
229	Chart on foster care population		Hearsay. FRE 802.	<ul style="list-style-type: none"> • See General Response No. 5.
230	Chart on placement moves		Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.C.	<ul style="list-style-type: none"> • See General Response No. 1.
231	7/31/2020 Email exchange between Josh Miller to Lacey Andresen et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.C.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA Subclass's claims, placements, and child well-being, among other issues. • See General Response Nos. 1 and 4.
232	Datasheet on exits		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.C.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA Subclass's claims, placements, and plaintiffs' right to protection from unnecessary intrusions into their well-being once the state has established a special relationship with the child, among other issues. • See General Response Nos. 1, 5, and 6.
233	Datasheet on placements		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.B. and I.C.	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements and a plaintiffs' right to protection from unnecessary intrusions into their well-being once the state has established a special relationship with the child, among other issues. • See General Response Nos. 1, 5, and 6.

234	Oregon CFSR 4 Data Profile Children's Bureau	Stip.	No objection	
235	Datasheet on placements		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.C.	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements and a plaintiffs' right to protection from unnecessary intrusions into their well-being once the state has established a special relationship with the child, among other issues. • See General Response Nos. 1, 5, and 6.
236	4/23/2018 Email exchange between Darin Mancuso and Bridget Byfield et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to maltreatment in care and placements, among other issues. • See General Response Nos. 1 and 4.
237	Seiler Memo-Legislative Update Notes		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional. • The exhibit is highly relevant to the ADA Subclass's claims, placements, services, and deliberate indifference, among other issues. • See General Response Nos. 1 and 5.
238	2019 Joint Plan to Develop In-State Capacity and Minimize Out-of-state Placements of Children		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, child safety, the ADA Subclass's claims, and deliberate indifference, among other issues. • See General Response Nos. 1 and 5.

239	8/2/2019 Email exchange between David Schmidt and Darin Mancuso et al		Hearsay. FRE 802.	<ul style="list-style-type: none"> • See General Response No. 4.
240	ORRAI Child Welfare Research Agenda: Service Array Analysis Draft		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Best evidence rule. FRE 1002. Inadmissible for the reasons explained in Defendants' Motions in Limine., including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA Subclass's claims, placements, and services, among other issues. • See General Response Nos. 1 and 5. • FRE 1002 does not apply. The exhibit is a report created by ORRAI and is the original document produced by Defendants in discovery.
241	12/28/2022 Letter from Rebecca Jones Gaston to Kate Brown		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to deliberate indifference, placements, services, and the ADA Subclass's claims, among other issues • See General Response Nos. 1, 4, and 5.
242	CP3-Children's Public Private Partnership		Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response No. 5.
243	1/18/2023 Email exchange between Tim Gillette to Lacey Andresen, Aprille Flint- Gerner et al.		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Hearsay. FRE 802.	<ul style="list-style-type: none"> • FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional. • See General Response No. 4.
244	Greater Oregon Behavioral Health Inc. – Oregon Kinship Navigator		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • The exhibit is highly relevant to kinship placements and services, among other issues. • See General Response No. 5.
245	2020 Secretary of State Audit	Stip.	No objection	

246	1/11/2023 Email exchange between Deena Loughary, Sarah Greenwood et al		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions II and III.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, services, maltreatment in care, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4. • The document is a public record, contains statements of a party opponent, and contains statements of declarants admissible for impeachment purposes.
247	9/25/2019 Email exchange between Jake Sunderland and Sara Fox		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, services, the ADA Subclass's claims, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
248	6/14/2022 Email with Sarah Fox et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to staffing, services, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
249	3/17/2022 Email with Sarah Fox et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, services, maltreatment in care, the Aging Out Subclass's claims, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
250	6/23/2022 Email with Sarah Fox et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible	<ul style="list-style-type: none"> • The exhibit is highly relevant to permanency, services, maltreatment in care, and deliberate indifference, among other

			for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<p>issues.</p> <ul style="list-style-type: none"> • See General Response Nos. 1 and 4.
251	9/26/2022 Email with Sarah Fox et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, services, maltreatment in care, and deliberate indifference, among other issues. • See General Response No. 4.
252	OTIS investigation of abuse		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.	<ul style="list-style-type: none"> • The exhibit is highly relevant to deliberate indifference, maltreatment in care, child safety and wellbeing, among other issues. Moreover, this exhibit is a screening report conducted by defendants pertaining to an individual child; Defendants seek to introduce numerous records from children's case files. • See General Response No. 5.
253	OTIS investigation of abuse		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.	<ul style="list-style-type: none"> • The exhibit is highly relevant to deliberate indifference, maltreatment in care, child safety and wellbeing, among other issues. Moreover, this exhibit contains screening information pertaining to an individual child; Defendants seek to introduce numerous records from children's case files. • See General Response No. 4 and 5.

254	9/21/2022 Email with Sarah Fox et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.	<ul style="list-style-type: none"> • The exhibit is highly relevant to maltreatment in care and deliberate indifference, among other issues. • <i>See</i> General Response No. 4.
255	10/7/2022 Email with Burke Belit et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, services, the ADA Subclass's claims, and deliberate indifference, among other issues. • <i>See</i> General Response Nos. 1 and 4.
256	1/5/2022 Email with Burke Belit et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A, V, and VIII.	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, temporary lodging, child well-being, maltreatment in care, and deliberate indifference, among other issues. • <i>See</i> General Response Nos. 1 and 4.
257	9/5/2022 Email with Fariborz Pakseresht et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, temporary lodging, permanency, maltreatment in care, and deliberate indifference, among other issues. • <i>See</i> General Response Nos. 4 and 6.
258	2/21/2023 Email exchange between Nathan Webber, Gina Zintz et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, staffing, licensing, maltreatment in care, and deliberate indifference, among other issues. • <i>See</i> General Response Nos. 4 and 6.

259	10/10/2023 Email with Lori McClure et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> The exhibit is highly relevant to placements, staffing, temporary lodging, and deliberate indifference, among other issues. <i>See</i> General Response Nos. 4 and 6.
260	7/20/2023 Email with Tom VanderVeen et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.	<ul style="list-style-type: none"> The exhibit is highly relevant to placements, staffing, licensing, maltreatment in care, and deliberate indifference, among other issues. <i>See</i> General Response No. 4.
261	5/24/2022 Email exchange between Rose Cokelly, Katrina Husbands, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Hearsay. FRE 802.	<ul style="list-style-type: none"> The exhibit is highly relevant to placements, staffing, licensing, training, resource parent needs, and deliberate indifference, among other issues. <i>See</i> General Response Nos. 4 and 6.
262	ORRAI Report	Stip.	No objection	
263	Findings letter from USDHHS	Stip.	No objection	
264	ORRAI Report Douglas County Achieving Permanency		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A., II, and III.A.	<ul style="list-style-type: none"> The exhibit is highly relevant to permanency, removals, services, and placements, among other issues. <i>See</i> General Response Nos. 1 and 5.
265	5/22/2022 Email with Rebecca Jones Gaston et al		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible	<ul style="list-style-type: none"> The exhibit is highly relevant to placements, staffing, case planning, services, maltreatment in care, and deliberate

			for the reasons explained in Defendants' Motions in Limine, including Motion I.C.	indifference, among other issues. • See General Response Nos. 1 and 4.
266	CRB CAPTA report	Stip.	No Objection	
267	Datasheet on temporary lodging		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.	• The exhibit is highly relevant to temporary lodging, placements, and permanency, and among other issues. • See General Response Nos. 1 and 5.
268	3/22/2022 Email with Garth Taft et al.		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.	• FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional. • The exhibit is relevant to establishing deliberate indifference, among other issues. The attachment to the email is another exhibit. • See General Response Nos. 1 and 4.
269	9/14/2022 Email from Stacey Loboy to Sarah Fox et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A. and V.	• The exhibit is highly relevant to services, placements, the ADA Subclass's claims, maltreatment in care, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
270	9/16/2022 Email exchange between Sara Fox, Billy Cordero, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Only part of the whole document has been offered. The rest of the document should be included. FRE	• The exhibit is highly relevant to services, placements, the ADA Subclass's claims, and deliberate indifference, among other issues. • FRE 106 is inapplicable. The

			106. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	exhibit constitutes a complete statement and fairness does not require anything additional. • See General Response Nos. 1 and 4.
271	Admission Denial Reasons		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	• The exhibit is highly relevant to the ADA Subclass's claims, services, and placements, among other issues. • See General Response Nos. 1 and 5.
272	BRS Program Review		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	• The exhibit is highly relevant to the ADA Subclass's claims, services, and placements, among other issues. • See General Response Nos. 1 and 5.
273	Datasheet on BRS Placements		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	• The exhibit is highly relevant to the ADA Subclass's claims, services, and placements, among other issues. • See General Response Nos. 1 and 5.
274	1/1/2022 Email exchange between Fariborz Pakseresht, John Kitzhaber, et al.		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Undisclosed expert testimony. FRE 702. Hearsay. FRE 802.	• FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional. • See General Response No. 4.

275	Dynamic Service Capacity		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA Subclass's claims and services, among other issues. • See General Response Nos. 1 and 5.
276	4/27/2021 Email exchange between Rebecca Jones Gaston, Sarah Fox, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA Subclass's claims, placements, deliberate indifference, and services, among other issues. • See General Response Nos. 1 and 4.
277	DHS/OHA report Oregon's Child, Youth & Family Continuum of Care		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA Subclass's claims, placements, maltreatment in care, deliberate indifference, and services, among other issues. • See General Response Nos. 1 and 5.
278	Oregon Council of Behavioral Health Statement and Recommendations		Inadmissible under FRE 702. Hearsay. FRE 802.	<ul style="list-style-type: none"> • FRE 702 does not apply; this is not expert testimony. • See General Response No. 5.
279	Addressing the Current Crisis in the Children's Behavioral Health System		Inadmissible under FRE 702. Hearsay. FRE 802.	<ul style="list-style-type: none"> • FRE 702 does not apply; this is not expert testimony. • See General Response No. 5.
280	Children's System Letter Response	Stip.	No Objection	
281	System of Care Plan for Oregon	Stip.	No Objection	

282	2022 SOCAC Legislative Report		Inadmissible under FRE 702. Hearsay. FRE 802.	<ul style="list-style-type: none"> • FRE 702 does not apply; this is not expert testimony. • <i>See</i> General Response No. 5.
283	12/14/2018 Email exchange between Sarah Fox, Glenda Marshall, et al.		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403.</p> <p>Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.</p>	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, staffing, training, maltreatment in care, and deliberate indifference, among other issues. <i>See</i> General Response Nos. 1, 4, and 6.
284	4/17/2017 Email exchange between Peter Rosenblatt, Glenda Marshall, et al.		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403.</p> <p>Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.</p>	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, services, the ADA Subclass's claims, maltreatment in care, and deliberate indifference, among other issues. <i>See</i> General Response Nos. 1, 4, and 6.
285	1/30/2019 Email exchange between Darin Mancuso, Wendy Leedle, et al.		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403.</p> <p>Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.</p>	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, services, the ADA Subclass's claims, maltreatment in care, and deliberate indifference, among other issues. • <i>See</i> General Response Nos. 1, 4, and 6.

286	Dynamic Service Capacity		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is relevant to the ADA Subclass's claims, services, and placements, among other issues. • See General Response Nos. 1 and 5.
287	Datasheet on BRS capacity		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is relevant to the ADA Subclass's claims, services, and placements, among other issues. • See General Response Nos. 1 and 5.
288	Datasheet on temporary lodging		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.	<ul style="list-style-type: none"> • The exhibit is relevant to temporary lodging and placements, among other issues. • See General Response Nos. 1 and 5.
289	2/2022 PRTF Memo	Stip.	No objection	
290	3/22/2022 Email exchange between Sarah Fox, Rebecca Jones Gaston et al		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional. • The exhibit is highly relevant to placements, services, the ADA Subclass's claims, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.

291	7/6/2022 Email exchange between Sarah Fox, Lacey Andresen, et al		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional. • The exhibit is highly relevant to placements, services, the ADA Subclass's claims, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
292	6/22/2022 Email exchange between Rebecca Jones Gaston, Aprille Flint-Gerner, et al		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, services, the ADA Subclass's claims, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
293	10/12/2022 Email exchange between David Schmidt, Ahnjene Boleyn, et al		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, services, the ADA Subclass's claims, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
294	4/14/2022 Email exchange between Darin Mancuso, Sarah Fox, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A. and I.C.	<ul style="list-style-type: none"> • The exhibit is highly relevant to placements, services, the ADA Subclass's claims, temporary lodging, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
295	Update on children's PRTF capacity	Stip.	No objection	

296	5/24/2022 Email exchange between Jacquelin Gravley, Nancy Allen, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA Subclass's claims and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
297	10/13/2022 Email exchange between Fariborz Pakseresht, Sarah Fox, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA Subclass's claims, temporary lodging, placements, staffing, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
298	6/2/2022 Email exchange between Nancy Allen, Angela Leet, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA Subclass's claims, temporary lodging, placements, services, child well-being, staffing, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
299	8/19/2022 Email exchange between Jennifer Graffunder, Aprille Flint-Gerner, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.A and V.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA Subclass's claims, temporary lodging, placements, services, child well-being, staffing, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
300	5/25/2022 Email exchange between Angela Leet, Liesl Wendt, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine,	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA and SGM Subclass's claims, temporary lodging, placements, services, child well-being, staffing, and deliberate indifference,

			including Motion I.A.	among other issues. • See General Response Nos. 1 and 4.
301	6/3/2022 Email exchange between Angela Leet, Fariborz Pakseresht, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	• The exhibit is highly relevant to the ADA Subclass's claims, temporary lodging, placements, services, child well-being, staffing, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
302	6/3/2022 Email exchange between Angela Leet, Liesl Wendt, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	• The exhibit is highly relevant to the ADA Subclass's claims, placements, services, child well-being, staffing, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
303	Temporary Lodging Progress Report 10/2/2023		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.	• This exhibit is highly relevant to substantive due process rights of the plaintiff class and certified common questions, including whether Defendants maintain a deficiency of appropriate placements, among other issues. • See General Response Nos. 1 and 5.
304	2019 Joint Plan to Develop In-State Capacity and Minimize Out-of-state Placements of Children		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	• The exhibit is highly relevant to child wellbeing, deliberate indifference, placements, services, and the ADA Subclass's claims, among other issues. • See General Response Nos. 1 and 5.

305	11/21/2022 Email exchange between Sara Fox, Rebecca Jones Gaston		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA Subclass's claims, placements, services, child well-being, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
306	2/4/2020 Email exchange between Meghan Nielson, Nancy Allen, et al.		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional. • The exhibit is highly relevant services, child well-being, staffing, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
307	State of Oregon v. Isaiah Webber, Motion to Modify Release Agreement, 23CR45572 (Marion Co. Ct. Nov. 8, 2023)		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion IV.	<ul style="list-style-type: none"> • See General Response No. 1
308	State of Oregon v. Isaiah Webber, Information, 23CR45572 (Marion Co. Ct. Sept. 19, 2023)		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion IV.	<ul style="list-style-type: none"> • The exhibit is highly relevant to deliberate indifference, maltreatment in care, placements, and Defendants' decision to allow a person charged with child abuse to operate a home for children, among other issues. • See General Response No. 1 • This is a public record. • Plaintiffs ask that the Court take judicial notice the

				facts of this exhibit pursuant to FRE 201.
309	Univ. of Kansas ROM Child Welfare Data		This document has not been provided to defendants. Defendants reserve the right to object if it is provided.	<ul style="list-style-type: none"> Plaintiffs informed Defendants that they wish to confer on how to best present evidence from this online dashboard at trial.
310	2016 Public Knowledge Report	Stip.	No objection	
311	Temporary Lodging Progress Report 2/1/2023		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.	<ul style="list-style-type: none"> This exhibit is highly relevant to substantive due process rights of the plaintiff class and certified common questions, including whether Defendants maintain a deficiency of appropriate placements, among other issues. See General Response Nos. 1 and 5.
312	2023-06-07 Child-Family BH OHA-SOCAC		Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> See General Response No. 5.
313	Temporary Lodging Presentation 9/18/2023		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.	<ul style="list-style-type: none"> This exhibit is highly relevant to substantive due process rights of the plaintiff class and certified common questions, including whether Defendants maintain a deficiency of appropriate placements, among other issues. See General Response No. 1.

314	6/15/2021 Email exchange between Simon Fulford, Lacey Andresen, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant services, child well-being, staffing, the ADA Subclass's claims, placements, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
315	1/19/2022 Email exchange between Lacey Andresen, Chere Lefore, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant services, child well-being, staffing, caseloads, the Aging Out Subclass's claims, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
316	Comprehensive Statewide Plan to Prevent Child Maltreatment Fatalities April 2022	Stip.	No objection	
317	DHS Pilot – OHSU Collaboration to support high needs youth		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion I.A.	<ul style="list-style-type: none"> • The exhibit is highly relevant to temporary lodging, services, the common question regarding deficiency in the availability of appropriate placement, the ADA Subclass's claims, among other issues. • See General Response Nos. 1 and 5.
318	Temporary Lodging-Working Steering Committee 10/5/2022		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.	<ul style="list-style-type: none"> • The exhibit is highly relevant to temporary lodging, services, the common question regarding deficiency in the availability of appropriate placement, the ADA Subclass's claims, among other issues. • See General Response Nos. 1 and 5.

319	12/28/2022 Email exchange between Sherrelle Jackson, Stacey Mahler, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.D. and V.	<ul style="list-style-type: none"> • The exhibit is highly relevant services, child well-being, staffing, caseloads, the Aging Out Subclass's claims, placements, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
320	12/30/2022 Email exchange between Sherrelle Jackson, Stacey Mahler, et al.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.D. and V.	<ul style="list-style-type: none"> • The exhibit is highly relevant services, child well-being, staffing, caseloads, the Aging Out Subclass's claims, and deliberate indifference, among other issues. • See General Response Nos. 1 and 4.
321	Temporary Lodging – Working 2/28/2022		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion V.	<ul style="list-style-type: none"> • The exhibit is highly relevant to temporary lodging, services, the common question regarding deficiency in the availability of appropriate placement, the ADA Subclass's claims, among other issues. • See General Response Nos. 1 and 5.
322	Holding Hope: Children's Behavioral Health in Oregon		Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response No. 5. This report was created by the Oregon Health Authority and produced to Plaintiffs in discovery.
323	Compilation of Complaints against ODHS		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice and confusion of issues. FRE 403. Prohibited use of evidence of prior act. FRE 404(b). Hearsay. FRE 802.	<ul style="list-style-type: none"> • The exhibit is highly relevant to establishing deliberate indifference, maltreatment in care, among other issues. • See General Response Nos. 1, 5, 6. Plaintiffs further ask that the Court take judicial notice the facts of this exhibit pursuant to

			Authenticity. FRE 901 Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion IV.	FRE 201.
324	Statements from Juvenile Attorneys		This document has not been provided to defendants. Defendants reserve the right to object if it is provided.	
325	Withheld maltreatment records responsive to Plaintiffs' 15 th RFP, 16 th RFP and class representatives		This document has not been provided to defendants. Defendants reserve the right to object if it is provided.	
326	2/28/2024 Stockdale Statement		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.C., and V.	<ul style="list-style-type: none"> • The exhibit is highly relevant to services, temporary lodging, and placements, among other issues. • See General Response No. 1.
327	2/28/2024 Shiprack Statement		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.C. and V.	<ul style="list-style-type: none"> • The exhibit is highly relevant to services, temporary lodging, child well-being, and placements, among other issues. • See General Response No. 1.
328	2/28/2024 Ponting, Maupin Statements		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.C.	<ul style="list-style-type: none"> • The exhibit is highly relevant to services, temporary lodging, child well-being, and placements, among other issues. • See General Response No. 1.

			and V.	
329	2/28/2024 Montgomery Statement		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motions I.C. and V.	<ul style="list-style-type: none"> • The exhibit is highly relevant to services, temporary lodging, child well-being, and placements, among other issues. • See General Response No. 1.
330	JM – Deposition of Dawn Hunter, 6.3.22		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
331	JM – Deposition of Dawn Hunter, 7.15.22		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
332	JM – Deposition of Dawn Hunter,		Not relevant because it does not tend to make any fact of	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6.

	10.13.23		<p>consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
333	JM – Deposition of Desta Walsh		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
334	JM – Deposition of Michelle Pfeiffer		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

335	JM – Deposition of Melanie Parent		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice.</p> <p>FRE 403. Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • <i>See</i> General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
336	JM – Deposition of Michael John Payne		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice.</p> <p>FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • <i>See</i> General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
337	JM - Deposition of Lacey Andresen		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice.</p> <p>FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • <i>See</i> General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

338	JM - Deposition of Stacey Ayers, 5/16/22		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
339	JM - Deposition of Stacey Ayers, 12/01/21		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
340	JM - Deposition of Billy Cordero		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

341	JM - Deposition of Stacey Daeschner		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
342	JM - Deposition of Kevin George		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
343	JM Ex. 26: Miller Cert file (00152920016260) - deduped (Corrected)		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
344	JM Ex. 28: OR-Kids Provider NOTES		Not relevant because it does not tend to make any fact of	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6.

			<p>consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
345	JM Ex. 32: Certification Emails		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
346	JM Ex. 34: JM-PROD-0016452 (3.13.12 Screening Report)		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

347	JM Ex. 36: JM Photos		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
348	JM Ex. 37: CH - ORKids file (excerpt)		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
349	JM Ex. 61: 2016 Final Report – Excerpts		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

350	JM Ex. 66: OR SOS – Audit; DHS Responses 02.2020	–Stip.	No objection	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
351	JM Ex. 78: CPS – Assessment Summary 10.20.13		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
352	JM Ex. 81: LH – Case Review Addendum 01.08.14		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

353	JM Ex. 99: Email re Out of Home Investigation		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
354	JM Ex. 100: DHS Victim Rights Notifications		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
355	JM Ex. 110: AS, JM – Email Correspondence		Plaintiffs have represented that Ex. 355 is a duplicate of Ex. 356. Defendants incorporate the objection to Ex. 356 here and reserve the right to supplement this objection.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
356	JM Ex. 118: AS, JM Email Correspondence		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and

			<p>outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<p>continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.</p>
357	JM Ex. 245: RL - Emails (All)		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
358	JM Ex. 289: Parent – Org Charts		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
359	JM Ex. 290: OR SOS DHS Audit 01.2018	Stip.	No objection	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was

				attached to the depositions of the workers, which were defended by DOJ trial counsel.
360	JM Ex. 291: DHS Foster Care Audit Response 01.29.18	Stip.	No objection	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
361	JM Ex. 292: OR SOS DHS Audit – 2019	Stip.	No objection	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
362	JM Ex. 293: OR SOS - DHS OR Kids Audit – 02.2020	Stip.	No objection	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

363	JM Ex. 294: OR SOS DHS Audit – 07.2020	Stip.	No objection	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
364	JM Ex. 295: State Defs – Response to Plf’s Rogs (2 nd) 04.30.21		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
365	JM Ex. 296: SFR - Parent Final Report		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

366	JM Ex. 297: SFR Edits Highlights & Review		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
367	JM Ex. 298: SFR - Hurley Final Report		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
368	JM Ex. 299: JM-PROD-0054934 - CH Case File		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

369	JM Ex. 300: Parent – Additional Emails		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
339	JM - Deposition of Stacey Ayers, 12/01/21		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
340	JM - Deposition of Billy Cordero		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

341	JM - Deposition of Stacey Daeschner		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice.</p> <p>FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
342	JM - Deposition of Kevin George		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice.</p> <p>FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
343	JM Ex. 26: Miller Cert file (00152920016260) - deduped (Corrected)		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice.</p> <p>FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

344	JM Ex. 28: OR-Kids Provider NOTES		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice.</p> <p>FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
345	JM Ex. 32: Certification Emails		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice.</p> <p>FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
346	JM Ex. 34: JM-PROD-0016452 (3.13.12 Screening Report)		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice.</p> <p>FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

347	JM Ex. 36: JM Photos		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
348	JM Ex. 37: CH - ORKids file (excerpt)		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
349	JM Ex. 61: 2016 Final Report – Excerpts		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

350	JM Ex. 66: OR SOS – Audit; DHS Responses 02.2020	Stip.	No objection	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
351	JM Ex. 78: CPS – Assessment Summary 10.20.13		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
352	JM Ex. 81: LH – Case Review Addendum 01.08.14		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

353	JM Ex. 99: Email re Out of Home Investigation		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
354	JM Ex. 100: DHS Victim Rights Notifications		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
355	JM Ex. 110: AS, JM – Email Correspondence		Plaintiffs have represented that Ex. 355 is a duplicate of Ex. 356. Defendants incorporate the objection to Ex. 356 here and reserve the right to supplement this objection.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
356	JM Ex. 118: AS, JM Email Correspondence		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and

			<p>outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<p>continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.</p>
357	JM Ex. 245: RL - Emails (All)		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
358	JM Ex. 289: Parent – Org Charts		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
359	JM Ex. 290: OR SOS DHS Audit 01.2018	Stip.	No objection	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was

				attached to the depositions of the workers, which were defended by DOJ trial counsel.
360	JM Ex. 291: DHS Foster Care Audit Response 01.29.18	Stip.	No objection	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
361	JM Ex. 292: OR SOS DHS Audit – 2019	Stip.	No objection	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
362	JM Ex. 293: OR SOS - DHS OR Kids Audit – 02.2020	Stip.	No objection	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

363	JM Ex. 294: OR SOS DHS Audit – 07.2020	Stip.	No objection	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
364	JM Ex. 295: State Defs – Response to Plf’s Rogs (2 nd) 04.30.21		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
365	JM Ex. 296: SFR - Parent Final Report		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

366	JM Ex. 297: SFR Edits Highlights & Review		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
367	JM Ex. 298: SFR - Hurley Final Report		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
368	JM Ex. 299: JM-PROD-0054934 - CH Case File		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
369	JM Ex. 300: Parent – Additional Emails		Not relevant because it does not tend to make any fact of	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6.

			<p>consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
370	JM Ex. 341: Org Charts – Ayers		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
371	JM Ex. 342: CIRT Chapter 413 Division 017		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
372	JM Ex. 343: Child Welfare Procedure Manual (excerpt)		<p>Only part of the whole document has been offered. The rest of the document should be included. FRE 106.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was

				attached to the depositions of the workers, which were defended by DOJ trial counsel.
373	JM Ex. 344: DHS 30 Day CIRT (exhibit from Mooney)		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
374	JM Ex. 345: Foster Care Safety Team Final Report 2010		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Authenticity. FRE 901. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
375	JM Ex. 346: 2010.11.22 – Article		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

376	JM Ex. 347: 2010.11.27 – Article		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
377	JM Ex. 348: 2013.05.01 – Lopez email and Karly’s Law Training		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
378	JM Ex. 349: Ayers – Emails		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants’ Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

379	JM Ex. 350: JM Injury Timeline		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
380	JM Ex. 351: 2013.12.13 – Interoffice Memo Hunter to Jolin		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
381	JM Ex. 352: DAS – Response to Lathen TCN		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Probative value substantially outweighed by danger of unfair prejudice. FRE 403.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p> <p>Inadmissible for the reasons explained in Defendants' Motions in Limine , including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

382	JM Ex. 353: 2017.09.07 - Article		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
383	JM Ex. 356: SB 819 Clip 1 - Senate Comm. on Human Services - 03.13.2017		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Authenticity. FRE 901. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
384	JM Ex. 357: SB 819 Clip 2 - Senate Comm. on Human Services - 03.13.2017		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

			Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	
385	JM Ex. 358: SB 819 Clip 3 - Senate Comm. on Human Services - 03.13.2017		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Authenticity. FRE 901. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
386	JM Ex. 359: SB 819 Clip 4 - Senate Comm. on Human Services - 03.13.2017		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Authenticity. FRE 901. Hearsay. FRE 802. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
387	JM Ex. 371: 04.25.14 Email to George from Lopez		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and

			<p>outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<p>continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.</p>
388	<p>JM Ex. 373: JM et al v Major et al - State Defs' PROD 38 Letter to Pltfs' Counsel</p>		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine , including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
389	<p>JM Ex. 376: AG 27 - Pearson 05.28.14_Sensitive Issue Report</p>		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
390	<p>JM Ex. 378: 285 - Wallins</p>		<p>Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE</p>	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in

			401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
391	JM Ex. 379: 425 - Evans - 04.08.15 - Evans Emails		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine , including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
392	JM Ex. 400: LH Exhibit 031 - 31 - CART Meeting (3.20.17)		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
393	JM Ex. 402: 27 - Pearson 05.28.14_Sensitive Issue Report		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were

			Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	defended by DOJ trial counsel.
394	JM Ex. 419: 239 - Burnell 1.16.15 - Sensitive File Review 7.06.2011		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
395	JM Ex. 422: 273 - Hunter 2.10.15 - Mooney Foster Home Sensitive Case Staffing		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
396	JM Ex. 423: 274 - Hunter 2.10.15 - Sensitive Case Staffing Notes		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial

			explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	counsel.
397	JM Ex. 424: 275 - Hunter 2.10.15 - 7.27.11 Rene Duboise e-mail		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
398	JM Ex. 429: 361 - Duboise 3.18.15 - Duboise Emails		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
399	JM Ex. 430: 440 - Daeschner - 04.09.15 - Daeschner Emails		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial

			explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	counsel.
400	JM Ex. 431: 451 - Faulkner - 10.22.15		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
401	JM Ex. 433: JM- PROD- 0223463		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
402	JM Ex. 434: JM- PROD- 0223599		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Authenticity. FRE 901. Inadmissible for the reasons	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were

			explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	defended by DOJ trial counsel.
403	JM Ex. 436: JM-PROD- 0223608		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
404	JM Ex. 438: JM-PROD- 0223664		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
405	JM Ex. 442: Prod 35 - Kwapisz - Hunter		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

406	JM Ex. 445: 2018.05.11 - Changes for Oregon's struggling foster care system - OregonLive		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
407	JM Ex. 446: 2019.11.30 - Foster care supervisor who drew criticism... - OregonLive		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
408	JM Ex. 456: 371 - Kane Suleiman - 3.23.15 - Emails		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

409	JM Ex. 457: 425 - Evans - 04.08.15 - Evans Emails		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
410	JM Ex. 463: Videotaped Deposition of Dawn E. Hunter, 02.17.15		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
411	JM Ex. 464: Declaration of Paulo Jauregui		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

412	JM Ex. 466: Declaration of Daniel Wren		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
413	JM Ex. 467: Declaration of Anna Dennis, M.S., C.G.C.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
414	JM Ex. 468: Declaration of Ian G. Loewen-Thomas, M.D.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

415	JM Ex. 469: Declaration of Dr. Rose Eagle		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
416	JM Ex. 470: Declaration of Tahra Sinks		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
417	JM Ex. 471: Declaration of Gail Nosek		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.

418	JM Ex. 472: Declaration of Lindsay Soto		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
419	JM Ex. 473: Declaration of Nina Joanne Hyndman, M.D.		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Probative value substantially outweighed by danger of unfair prejudice. FRE 403. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B., III.C, IV. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • See General Response Nos. 1 and 6. • The exhibit is relevant to notice, specific instances of harm to foster children, and continuation of harmful practices to children in care, and the exhibit was attached to the depositions of the workers, which were defended by DOJ trial counsel.
420	Child Abuse Prevention and Treatment Act (CAPTA) Citizen Review Panels (CRP) Report for the 2022-23 Fiscal Year		Inadmissible under FRE 702. Hearsay. FRE 802.	<ul style="list-style-type: none"> • FRE 702 does not apply; this is not expert testimony. • See General Response No. 5. This is a report by the Citizen's Review Board ("CRB") Panel. Defendants intend to call witnesses to testify about the CRB.
421	2021.01.26 BE Court Report		This document has not been provided to defendants. Defendants reserve the right to object if it is provided.	<ul style="list-style-type: none"> • The exhibit was provided to Defendants on April 25, 2024.

422	2022.07.21 BE Screening Report Memo		This document has not been provided to defendants. Defendants reserve the right to object if it is provided.	The exhibit was provided to Defendants on April 25, 2024.
423	2023.11.13 Court Memo - SJ		This document has not been provided to defendants. Defendants reserve the right to object if it is provided.	The exhibit was provided to Defendants on April 25, 2024.
424	2024.03.01 Preservation of Evidence LTR - SJ		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III.B and IV.	<ul style="list-style-type: none"> • The exhibit is relevant to deliberate indifference and maltreatment in care, among other issues. • See General Response Nos. 1 and 5.
425	Child X - Dr. Edwinson 11.23.2024 eval		This document has not been provided to defendants. Defendants reserve the right to object if it is provided.	<ul style="list-style-type: none"> • The exhibit was provided to Defendants on April 25, 2024.
426	CV - Roxanne Edwinson_March 2024		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Inadmissible under FRE 702. Hearsay. FRE 802. Authenticity. FRE 901. Inadmissible for the reasons explained in Defendants' Motions in Limine, including Motion III B. and IV.	<ul style="list-style-type: none"> • FRE 702 does not apply; this is not expert testimony.
427	MindSights_Behavioral Health Liaison Proposal DRAFT		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901. Best evidence rule. FRE 1002.	<ul style="list-style-type: none"> • The exhibit is highly relevant to the ADA Subclass's claims, services, and placements, among other issues. • FRE 1002 does not apply. The exhibit is a report created by MindSights and

				<p>is the original document produced by Defendants in discovery.</p> <ul style="list-style-type: none"> • See General Response No. 5.
428	RAPID Sampling Statistics Report 2023.12		<p>Only part of the whole document has been offered. The rest of the document should be included. FRE 106.</p> <p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p>	<ul style="list-style-type: none"> • FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional. • The exhibit is highly relevant to the ADA Subclass's claims, services, and placements, among other issues. • See General Response No. 5.
429	Updated RAPID Program Overview_10.2023		<p>Only part of the whole document has been offered. The rest of the document should be included. FRE 106.</p> <p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Hearsay. FRE 802.</p> <p>Authenticity. FRE 901.</p>	<ul style="list-style-type: none"> • FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional. • The exhibit is highly relevant to the ADA Subclass's claims, services, and placements, among other issues. • See General Response No. 5.
430	2021.01.28 emails re H.A		<p>This document has not been provided to defendants. Defendants reserve the right to object if it is provided.</p>	<ul style="list-style-type: none"> • Plaintiffs produced this exhibit on April 25, 2024.
431	Emails re Child X		<p>This document has not been provided to defendants. Defendants reserve the right to object if it is provided.</p>	<ul style="list-style-type: none"> • Plaintiffs produced this exhibit on April 25, 2024.
432	OPB - Oregon is Placing Foster Children in Short-term Rental Homes... - 11.20.2023		<p>Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401.</p> <p>Hearsay. FRE 802.</p>	<ul style="list-style-type: none"> • This exhibit is relevant to the issues of temporary lodging, deliberate indifference, maltreatment in care, and placements,

			Authenticity. FRE 901.	among others. • The exhibit is self-authenticating. <i>See</i> FRE 902(6).
433	OPB - As Oregon Touts Yoga At Out-Of-State Facility for Foster Youth, Utah Cites Mistreatment - 05.16.2019		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • This exhibit is highly relevant to the issues of temporary lodging, deliberate indifference, maltreatment in care, and placements, among others. • The exhibit is self-authenticating. <i>See</i> FRE 902(6). • The exhibit is self-authenticating. <i>See</i> FRE 902(6).
434	OPB - As Washington Pulls Foster Kids From Facility, Oregon Children Remain - 06.04.2019		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • This exhibit is relevant to the issues of deliberate indifference, maltreatment in care, and placements, among others.
435	OPB - Guns Drawn On Oregon Foster Care Children in Out-Of-State Facility in April - 05.07.2019		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • This exhibit is relevant to the issues of deliberate indifference, maltreatment in care, and placements, among others. • The exhibit is self-authenticating. <i>See</i> FRE 902(6).
436	OPB - Oregon Foster Youth Assaulted In Out-Of-State Facility Testifies to Lawmakers - 02.05.2020		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • This exhibit is relevant to the issues of temporary lodging, deliberate indifference, maltreatment in care, placements, and staffing, among others. • The exhibit is self-authenticating. <i>See</i> FRE 902(6).

437	OPB - Utah Facility Housing Oregon Foster Youth To Close After Reports Of Abuse - 07.11.2019		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • This exhibit is relevant to the issues of temporary lodging, deliberate indifference, maltreatment in care, and placements, among others. • The exhibit is self-authenticating. <i>See</i> FRE 902(6).
438	Oregonian - Officials-Oregon foster child was assaulted at Utah program - 05.08.2019		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • This exhibit is relevant to the issues of deliberate indifference, maltreatment in care, and placements, among others. • The exhibit is self-authenticating. <i>See</i> FRE 902(6).
439	Oregonian - Oregon officials say they were overly trusting... - 05.29.2019		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • This exhibit is relevant to the issues deliberate indifference, maltreatment in care, and placements, among others. • The exhibit is self-authenticating. <i>See</i> FRE 902(6).
440	Oregonian - Teens riot at Utah facility that houses... - 04.30.2019		Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802. Authenticity. FRE 901.	<ul style="list-style-type: none"> • This exhibit is relevant to the issues of temporary lodging, deliberate indifference, maltreatment in care, and placements, among others. • The exhibit is self-authenticating. <i>See</i> FRE 902(6).
441	7/21/2019 Email exchange between Paul Bellatty, Richard Wexler, Fariborz Pakseresht, et al.		Only part of the whole document has been offered. The rest of the document should be included. FRE 106. Not relevant because it does not tend to make any fact of consequence more probable or less probable. FRE 401. Hearsay. FRE 802.	<ul style="list-style-type: none"> • FRE 106 is inapplicable. The exhibit constitutes a complete statement and fairness does not require anything additional. • The exhibit is highly relevant to deliberate indifference, among other issues. • <i>See</i> General Response No. 4.

DATED this 29th day of April, 2024.

DAVIS WRIGHT TREMAINE LLP

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